# Clearview Financial, Inc. Client Brochure

This brochure provides information about the qualifications and business practices of Clearview Financial, Inc. If you have any questions about the contents of this brochure, please contact us at (858) 450-3254 or by email at: mark@clearviewfin.com. The information in this brochure has not been approved or verified by the United States Securities and Exchange Commission or by any state securities authority.

Additional information about Clearview Financial, Inc. is also available on the SEC's website at www.adviserinfo.sec.gov. Clearview Financial, Inc.'s CRD number is: 131944

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Registration does not imply a certain level of skill or training.

Version Date: 1/8/2024

# **Item 2: Material Changes**

The material changes in this brochure from the last annual updating amendment of Clearview Financial, Inc. on 1/18/23 are described below.

Clearview moved their main office to: 11622 El Camino Real, Suite 100 San Diego, CA 92122

Office phone number changed to 858-450-3200

From time to time, we may amend this Brochure to reflect changes in our business practices, changes in regulations, and routine annual updates as required by securities regulators. Either this complete Brochure or a Summary of Material Changes shall be provided to each Client annually and if a material change occurs in the business practices of Clearview Financial, Inc.

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### **Item 4: Advisory Business**

#### A. Description of the Advisory Firm

This firm has been in business since June 5, 2001, and the principal owner is Mark S. Young.

#### **B.** Types of Advisory Services

Clearview Financial, Inc. (hereinafter "CF") offers the following services to advisory clients:

#### **Investment Supervisory Services**

CF offers ongoing portfolio management services based on the individual goals, objectives, time horizon, and risk tolerance of each client. CF creates an Investment Policy Statement for each client, which outlines the client's current situation (income, tax levels, and risk tolerance levels) and then constructs a plan (the Investment Policy Statement) to aid in the selection of a portfolio that matches each client's specific situation. Investment Supervisory Services include, but are not limited to, the following:

- Investment strategy
- Personal investment policy
- Asset allocation
- Asset selection
- Risk tolerance
- Regular portfolio monitoring

CF evaluates the current investments of each client with respect to their risk tolerance levels and time horizon. Risk tolerance levels are documented in the Investment Policy Statement, which is given to each client.

CF also may render non-discretionary investment management services to clients relative to their individual employer-sponsored retirement plans. In so doing, CF either directs or recommends the allocation of client assets among the various mutual fund subdivisions that comprise the retirement plan. The client assets shall be maintained at the custodian designated by the sponsor of the client's retirement plan.

Clients are advised to promptly notify CF if there are ever any changes in their financial situation or investment objectives, or if they wish to impose any reasonable restrictions upon CF's management services.

Neither CF nor the client may assign the Investment Advisory Agreement without the prior written consent of the other party. Transactions that do not result in a change of actual control of management of CF shall not be considered an assignment.

#### Services Limited to Specific Types of Investments

CF limits its investment advice and/or money management to mutual funds, equities, bonds, fixed income, debt securities, ETFs, real estate, REITs, and government securities. CF may use other securities as well to help diversify a portfolio when applicable.

#### C. Client Tailored Services and Client Imposed Restrictions

CF offers the same suite of services to all of its clients. However, specific client financial plans and their implementation are dependent upon the client Investment Policy Statement which outlines each client's current situation (income, tax levels, and risk tolerance levels) and is used to construct a client specific plan to aid in the selection of a portfolio that matches restrictions, needs, and targets.

Clients may not impose restrictions in investing in certain securities or types of securities in accordance with their values or beliefs.

#### D. Wrap Fee Programs

CF does not participate in any wrap fee programs.

#### E. Amounts Under Management

CF has the following assets under management:

Discretionary Amounts:	Non-discretionary Amounts:	Date Calculated:
\$65,992,971	\$0	12/31/23

# **Item 5: Fees and Compensation**

#### A. Fee Schedule

#### **Investment Supervisory Services Fees**

Total Assets Under Management	Annual Fee
First \$500,000	1.00%
Next \$250,000	0.90%
Next \$250,000	0.85%
Above \$1,000,000	0.75%

These fees are negotiable. The final fee schedule will be attached to the Investment Advisory Contract you sign. Fees are paid quarterly in arrears based upon the market value of the assets on the last day of the previous quarter and clients may terminate their contracts with written notice. Because fees are charged in arrears, no refund policy is necessary. Clients may terminate their accounts without penalty within 5 business days of signing the advisory contract.

CF, in its sole discretion, may charge a lesser management fee based upon certain criteria (i.e. anticipated future earning capacity, anticipated future additional assets, dollar amount of assets to be managed, related accounts, account composition, pre-existing client, etc.).

Clients may make additions to and withdrawals from their accounts at any time, subject to CF's right to terminate an account that falls below its minimum account size. If assets are deposited or withdrawn from an account after the inception of a quarter which exceed \$25,000, the fee payable with respect to such assets will be prorated based on the number of days remaining in the quarter. Clients may withdraw account assets on notice to CF, subject to the usual and customary securities settlement procedures.

#### **B.** Payment of Fees

Payment of Investment Supervisory Fees

Advisory fees are withdrawn directly from the client's accounts. Fees are paid quarterly in arrears.

The investment adviser has custody of the funds and securities solely as a consequence of its authority to make withdrawals from client accounts to pay its advisory fee. The investment adviser has written authorization from the client to deduct advisory fees from the account held with the qualified custodian. Each time a fee is directly deducted from a client account, the investment adviser concurrently:

- 1. Sends the qualified custodian an invoice or statement of the amount of the fee to be deducted from the client's account; and
- Sends the client an invoice or statement itemizing the fee. Itemization includes the formula used to calculate the fee, the value of the assets under management on which the fee is based and the time period covered by the fee.

#### C. Clients Are Responsible For Third Party Fees

Clients are responsible for the payment of all third-party fees (i.e. custodian fees, mutual fund fees, transaction fee etc.). Those fees are separate and distinct from the fees and expenses charged by CF. Please see Item 12 of this brochure regarding broker/custodian.

#### D. Prepayment of Fees

CF collects its fees in arrears. It does not collect fees in advance.

### E. Outside Compensation for the Sale of Securities to Clients

Neither CF nor its supervised persons accept any compensation for the sale of securities or other investment products, including asset-based sales charges or services fees from the sale of mutual funds.

### Item 6: Performance-Based Fees and Side-By-Side Management

CF does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

# **Item 7: Types of Clients**

CF generally provides investment advice and/or management supervisory services to the following Types of Clients:

- Individuals
- High-Net-Worth Individuals

#### Minimum Account Size

There is an account minimum, \$375,000, which may be waived by the investment advisor, based on the needs of the client and the complexity of the situation.

# Item 8: Methods of Analysis, Investment Strategies and Risk, of Investment Loss

#### A. Methods of Analysis and Investment Strategies

CF uses fundamental analysis.

*Fundamental analysis* involves the analysis of financial statements, the general financial health of companies, and/or the analysis of management or competitive advantages.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

#### B. Material Risks Involved

CF uses Long Term Trading and Short-Term Trading strategies.

CF utilizes investment strategies that are designed to capture market rates of both return and risk. Frequent trading, when done, can affect investment performance, particularly through increased brokerage and other transaction costs and taxes.

Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

#### C. Risks of Specific Securities Utilized

CF generally seeks investment strategies that do not involve significant or unusual risk beyond that of the general domestic and/or international equity markets.

Past performance is not a guarantee of future returns. Investing in securities involves a risk of loss that you, as a client, should be prepared to bear.

# **Item 9: Disciplinary Information**

There are no legal or disciplinary events that are material to a client's or prospective client's evaluation of this advisory business or the integrity of our management.

### Item 10: Other Financial Industry Activities and Affiliations

#### A. Registration as a Broker/Dealer or Broker/Dealer Representative

Neither CF nor its representatives are registered as a broker/dealer or as representatives of a broker/dealer.

# B. Registration as a Futures Commission Merchant, Commodity Pool Operator, or a Commodity Trading Advisor

Neither CF nor its representatives are registered as a FCM, CPO, or CTA.

# C. Registration Relationships Material to this Advisory Business and Possible Conflicts of Interests

Mark S. Young is a certified public accountant and owner of the accounting firm, Mark S. Young, CPA, APC. From time to time, he will offer clients advice or products from those activities. Mr. Young currently devotes approximately sixty percent (60%) of his time to his practice as a certified public accountant. CF always acts in the best interest of the client.

All material conflicts of interest Under Section 260.238 (k) of the California Corporations Code are disclosed regarding the investment adviser, its representatives or any of its employees, which could be reasonable expected to impair the rendering of unbiased and objective advice.

### D. Selection of Other Advisors or Managers and How This Adviser is Compensated for Those Selections

CF does not utilize nor select other advisors or third-party managers. All assets are managed by CF management.

# Item 11: Code of Ethics, Participation in Transactions, Personal Trading

#### A. Code of Ethics

We have a written Code of Ethics that covers the following areas: Prohibited Purchases and Sales, Insider Trading, Personal Securities Transactions, Exempted Transactions, Prohibited Activities, Conflicts of Interest, Gifts and Entertainment, Confidentiality, Service on a Board of Directors, Compliance Procedures, Compliance with Laws and Regulations, Procedures and Reporting, Certification of Compliance, Reporting Violations, Compliance Officer Duties, Training and Education, Recordkeeping, Annual Review, and Sanctions. Clients may request a copy of our Code of Ethics from management.

#### B. Recommendations Involving Material Financial Interests

CF does not recommend that clients buy or sell any security in which a related person to CF has a material financial interest.

#### C. Investing Personal Money in the Same Securities as Clients

From time to time, representatives of CF may buy or sell securities for themselves that they also recommend to clients. CF will always document any transactions that could be construed as conflicts of interest and will always transact client business before their own when similar securities are being bought or sold.

#### D. Trading Securities At/Around the Same Time as Clients' Securities

From time to time, representatives of CF may buy or sell securities for themselves at or around the same time as clients. CF will not trade non-mutual fund or non-ETF securities 5 days prior to or 5 days after trading the same security for clients.

# **Item 12: Brokerage Practices**

#### A. Factors Used to Select Custodians and/or Broker/Dealers

The Custodian, CHARLES SCHWAB INSTITUTIONAL, member FINRA/SIPC/NFA, was chosen based on their relatively low transaction fees and access to mutual funds and ETFs. CF will never charge a premium or commission on transactions, beyond the actual cost imposed by Custodian.

#### 1. Research and Other Soft-Dollar Benefits

CF receives no research, product, or service other than execution from a broker-dealer or third-party in connection with client securities transactions ("soft dollar benefits").

#### 2. Brokerage for Client Referrals

CF receives no referrals from a broker-dealer or third party in exchange for using that broker-dealer or third party.

#### 3. Clients Directing Which Broker/Dealer/Custodian to Use

CF will not allow clients to direct CF to use a specific broker-dealer to execute transactions. Clients must use CF recommended custodian (broker-dealer). Not all investment advisers require their clients to direct brokerage. By requiring clients to use our specific custodian, CF may be unable to achieve most favorable execution of client transaction and that this may cost clients' money over using a lower-cost custodian.

#### B. Aggregating (Block) Trading for Multiple Client Accounts

CF maintains the ability to block trade purchases across accounts but will rarely do so. While block trading may benefit clients by purchasing larger blocks in groups, we do not feel that the clients are at a disadvantage due to the best execution practices of our custodian.

### **Item 13: Reviews of Accounts**

#### A. Frequency and Nature of Periodic Reviews and Who Makes Those Reviews

Client accounts are reviewed at least quarterly only by Mark S. Young, President. Mark S. Young is the chief advisor and is instructed to review clients' accounts with regards to their investment policies and risk tolerance levels. All accounts at Investment Advisor (IA) are assigned to this reviewer.

#### B. Factors That Will Trigger a Non-Periodic Review of Client Accounts

Reviews may be triggered by material market, economic or political events, or by changes in client's financial situations (such as retirement, termination of employment, physical move, or inheritance).

#### C. Content and Frequency of Regular Reports Provided to Clients

Each client will receive at least monthly a written report detailing the clients account performance, which may come from the custodian. Clients will also receive quarterly reports directly from the Investment Advisor.

### Item 14: Client Referrals and Other Compensation

# A. Economic Benefits Provided by Third Parties for Advice Rendered to Clients (Includes Sales Awards or Other Prizes)

CF does not receive any economic benefit, directly or indirectly from any third party for advice rendered to CF clients.

# B. Compensation to Non -Advisory Personnel for Client Referrals

CF does not directly or indirectly compensate any person who is not advisory personnel for client referrals.

### **Item 15: Custody**

CF can establish standing letter of instructions or other similar asset transfer authorization arrangements ("SLOA") with qualified custodians in order for us to disburse funds to accounts as specifically designated by the client. With a SLOA a client can typically authorize first-party and/or third-party transfers. If transfers are third-party, CF complies with each of the requirements and conditions enumerated below:

- 1. The client provides an instruction to the qualified custodian, in writing, that includes the client's signature, the third party's name, and either the third party's address or the third party's account number at a custodian to which the transfer should be directed.
- 2. The client authorizes CF, in writing, either on the qualified custodian's form or separately, to direct transfers to the third party either on a specified schedule or from time to time.
- 3. The client's qualified custodian performs appropriate verification of the instruction, such as a signature review or other method to verify the client's authorization, and provides a transfer of funds notice to the client promptly after each transfer.
- 4. The client has the ability to terminate or change the instruction to the client's qualified custodian.
- 5. CF has no authority or ability to designate or change the identity of the third party, the address, or any other information about the third party contained in the client's instruction.
- 6. CF maintains records showing that the third party is not a related party of CF or located at the same address as CF.
- 7. The client's qualified custodian sends the client, in writing, an initial notice confirming the instruction and an annual notice reconfirming the instruction.

#### **Item 16: Investment Discretion**

CF provides discretionary investment advisory services to clients. The Investment Advisory Contract established with each client outlines the discretionary authority for trading. Where investment discretion has been granted, CF generally manages the client's account and makes investment decisions without consultation with the client as to what securities to buy or sell, when the securities are to be bought or sold for the account, the total amount of the securities to be bought/sold, or the price per share. CF will also have discretionary authority to determine the broker dealer to be used for a purchase or sale of securities for a client's account.

# **Item 17: Voting Client Securities (Proxy Voting)**

CF will not ask for, nor accept voting authority for client securities. Clients will receive proxies directly from the issuer of the security or the custodian. Clients should direct all proxy questions to the issuer of the security.

### **Item 18: Financial Information**

#### A. Balance Sheet

CF does not require nor solicit prepayment of more than \$500 in fees per client, six months or more in advance and therefore does not need to include a balance sheet with this brochure.

# B. Financial Conditions Reasonably Likely to Impair Ability to Meet Contractual Commitments to Clients

Neither CF nor its management have any financial conditions that are likely to reasonably impair our ability to meet contractual commitments to clients.

#### C. Bankruptcy Petitions in Previous Ten Years

Neither CF nor its management has been the subject of a bankruptcy petition in the last ten years.

# Item 19: Requirements for State Registered Advisors

# A. Principal Executive Officers and Management Persons; Their Formal Education and Business Background

CF currently has only one management person and only one executive officer; Mark S. Young. Mark S. Young's education and business background can be found on the Supplemental ADV Part 2B form.

# B. Other Businesses in Which This Advisory Firm or its Personnel are Engaged and Time Spent on Those (If Any)

Mark S. Young's other business activities can be found on the Supplemental ADV Part 2B form.

# C. How Performance Based Fees are Calculated and Degree of Risk to Clients

CF does not accept performance-based fees or other fees based on a share of capital gains on or capital appreciation of the assets of a client.

# D. Material Disciplinary Disclosures for Management Persons of this Firm

No management person at CF has been involved in an arbitration claim or been found liable in a civil, self-regulatory organization, or administrative proceeding that is material to the client's evaluation of the firm or its management.

# E. Material Relationships That Management Persons Have With Issuers of Securities (If Any)

Neither CF, nor its management persons, has any relationship or arrangement with issuers of securities.